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July 7, 2022

Hon. Miroslav Lovric
United States Magistrate Judge
15 Henry Street
Binghamton, New York 13901

Re: *Estate of Joseph P. King v. Ward, et al*
Civil Case No.: 9:20-cv-1413

Dear Judge Lovric:

With respect to the discovery schedule for the instant matter, the Court has calendared Defendants' expert disclosure deadline for 7/19/2022, the discovery deadline for 8/19/22 and the dispositive motion deadline for 10/19/22. (Dkt. No. 64). To date, the parties have exchanged paper discovery and have completed six (6) depositions.

However, both parties intend to serve additional discovery demands as a result of the depositions, which were just completed on June 24, 2022. Further, in the event the parties choose to retain an expert, the expert must have the opportunity to review all materials disclosed during this case. Consequently, both parties respectfully request that the Court grant a ninety (90) day extension for all deadlines mentioned above.

Respectfully,

____s/_____
Aimee Cowan, Esq.
Assistant Attorney General

cc: Hillary Nappi, Esq., *via CM/ECF*
Yamile Kalkach, Esq., *via CM/ECF*

300 S. STATE STREET, STE. 300, SYRACUSE, NY 13202 • (315) 448-4800 • (315) 448-4853* NOT FOR SERVICE OF PAPERS

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